INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

August 4, 2003

TO: Interested Parties / Applicant

RE: Monroe Custom Utility Bodies, Inc. MSOP 059-7455-00026

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02

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MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Monroe Custom Utility Bodies, Inc.
3312 N. 600 W.
Greenfield, Indiana 46140

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 059-7455-00026	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 4, 2003 Expiration Date: August 4, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary truck body manufacturing plant for preassembled trucks.

Authorized Individual:	President
Source Address:	3312 N. 600 W., Greenfield, Indiana 46140
Mailing Address:	3312 N. 600 W., Greenfield, Indiana 46140
General Source Phone:	317-894-8684
SIC Code:	3713
County Location:	Hancock
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) metal parts surface coating process, identified as EU1, capacity: 1,100 pounds of metal parts per hour, consisting of:

(1) One (1) undercoating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to a roof fan,

(2) One (1) primer coating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack S2, and

(3) One (1) color coating booth, installed in 1989, equipped with high volume low dry filters to control particulate overspray, exhausting to Stack S3.

(b) One (1) caulks and body repairs operations, identified as EU4, installed in 1969, delivers flow coating to the applicators, capacity: 12,000 pounds of metal parts per hour.

(c) One (1) touch-up operation, equipped with manual spray applicators.

(d) One (1) wash bay, identified as EU3, installed in 1969, capacity: 300 gallons of inorganic cleaning solvent per hour.

(e) One (1) gun cleaning operation, identified as EU5, installed in 1969, capacity 0.125 gallons of cleaner per hour.

(f) One (1) natural gas-fired boiler, identified as B-1, installed in 1989, exhausting to Stack B-1, heat input capacity: 1.50 million British thermal units per hour.

(g) Two (2) air make-up units, installed in 1989, capacity: 1.00 million British thermal units per hour each.

(h) One (1) welding and metal cutting operation, identified as EU2, installed in 1969, exhausting to Stack S1, consisting of the following:

(1) Nineteen (19) metal inert gas (MIG) welding stations, using Carbon Steel type of wire, capacity: 0.5 pounds of wire per hour each,

(2) Three (3) stick welding stations, capacity: 0.5 pounds per hour of welding rod each,

(3) Two (2) portable plasma cutters, each cut at 30 inches per minute on 0.125 inch hot rolled steel,

(4) One (1) plasma table, cuts at 30 inches per minute on 0.125 inch hot rolled steel, and

(5) Nine (9) oxyfuel stations, each cut at 30 inches per minute on 0.125 inch thickness.

(i) Unpaved roads.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if

received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, when applicable) U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-7-1(34).

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and recordkeeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected

emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Recordkeeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Recordkeeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Surface Coating

(a) One (1) metal parts surface coating process, identified as EU1, capacity: 1,100 pounds of metal parts per hour, consisting of:

(1) One (1) undercoating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to a roof fan,

(2) One (1) primer coating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack S2, and

(3) One (1) color coating booth, installed in 1989, equipped with high volume low dry filters to control particulate overspray, exhausting to Stack S3.

(b) One (1) caulks and body repairs operations, identified as EU4, installed in 1969, delivers flow coating to the applicators, capacity: 12,000 pounds of metal parts per hour.

(c) One (1) touch-up operation, equipped with manual spray applicators.

(d) One (1) wash bay, identified as EU3, installed in 1969, capacity: 300 gallons of inorganic cleaning solvent per hour.

(e) One (1) gun cleaning operation, identified as EU5, installed in 1969, capacity 0.125 gallons of cleaner per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, for air dried and extreme performance coatings as delivered to the applicator at the one (1) metal parts coating process, identified as EU1, consisting of one (1) undercoating booth, one (1) prime coating booth, and one (1) color coating booth.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of one (1) metal parts coating process during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2(d)]

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) undercoating booth, the one (1) prime coating booth, and the one (1) color coating booth, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the prime coating booth, undercoating booth, and the color coating booth and their respective control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no compliance monitoring requirements for these facilities.

Recordkeeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Recordkeeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records as stated below. Records shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

The VOC content of each coating material and solvent used less water.

(1) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and VOC content.

(2) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(b) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Combustion, Welding, and Fugitives

(f) One (1) natural gas-fired boiler, identified as B-1, installed in 1989, exhausting to Stack B-1, heat input capacity: 1.50 million British thermal units per hour.

(g) Two (2) air make-up units, installed in 1989, capacity: 1.00 million British thermal units per hour each.

(h) One (1) welding and metal cutting operation, identified as EU2, installed in 1969, exhausting to Stack S1, consisting of the following:

(1) Nineteen (19) metal inert gas (MIG) welding stations, using Carbon Steel type of wire, capacity: 0.5 pounds of wire per hour each,

(2) Three (3) stick welding stations, capacity: 0.5 pounds per hour of welding rod each,

(3) Two (2) portable plasma cutters, each cut at 30 inches per minute on 0.125 inch hot rolled steel,

(4) One (1) plasma table, cuts at 30 inches per minute on 0.125 inch hot rolled steel, and

(5) Nine (9) oxyfuel stations, each cut at 30 inches per minute on 0.125 inch thickness.

(i) Unpaved roads.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the particulate from the one (1) natural gas-fired boiler (B-1), installed in 1989, rated at 1.50 million British thermal units per hour, shall not exceed 0.6 pound per million British thermal units.

Compliance Determination Requirements

There are no compliance determination requirements for these facilities.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no compliance monitoring requirements for these facilities.

Recordkeeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no recordkeeping and reporting requirements for these facilities.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*** Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Monroe Custom Utility Bodies, Inc.**
Address:	**3312 N. 600 W.**
City:	**Greenfield, Indiana 46140**
Phone #:	**317-894-894**
MSOP #:	**MSOP 059-7455-00026**

I hereby certify that Monroe Custom Utility Bodies, Inc. is

9 still in operation.
9 no longer in operation.

I hereby certify that Monroe Custom Utility Bodies, Inc. is

9 in compliance with the requirements of MSOP **059-7455-00026**.
9 not in compliance with the requirements of MSOP **059-7455-00026**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Minor Source Operating Permit

Source Name:	**Monroe Custom Utility Bodies, Inc.**
Source Location:	**3312 N. 600 W., Greenfield, Indiana 46140**
County:	**Hancock**
Operating Permit No.:	**MSOP 059-7455-00026**
SIC Code:	**3713**
Permit Reviewer:	**Michael S. Schaffer**

On June 26, 2003, the Office of Air Quality (OAQ) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Monroe Custom Utility Bodies, Inc. had applied for an operating permit to operate one (1) truck body manufacturing operation with dry filters to control particulate overspray. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the operating permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

The source address and mailing address in Condition A.1 has been corrected from 6000 W. to 600 W. as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary truck body manufacturing plant for preassembled trucks.

Source Address:	3312 N. 600~~0~~ W., Greenfield, Indiana 46140
Mailing Address:	3312 N. 600~~0~~ W., Greenfield, Indiana 46140

Change 2:

The limitation in Condition D.1.1 should specify which facilities in Section D.1 are subject to the requirements of 326 IAC 8-2-9. Therefore, Condition D.1.1 has been revised as follows:

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5)~~, three~~ pounds of VOC per gallon of coating, excluding water, for air dried and extreme performance coatings as delivered to the applicator **at the one (1) metal parts coating process, identified as EU1, consisting of one (1) undercoating booth, one (1) prime coating booth, and one (1) color coating booth**.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	**Monroe Custom Utility Bodies, Inc.**
Source Location:	**3312 N. 600 W., Greenfield Indiana 46140**
County:	**Hancock**
SIC Code:	**3713**
Operation Permit No.:	**MSOP 059-7455-00026**
Permit Reviewer:	**Michael S. Schaffer**

The Office of Air Quality (OAQ) has reviewed an application from Monroe Custom Utility Bodies, Inc. relating to the operation of a truck body manufacturing plant for pre-assembled trucks.

History

Monroe Custom Utility Bodies, Inc. submitted a Part 70 permit application received by IDEM, OAQ on December 11, 1996. On April 26, 1999, IDEM, OAQ received a response to a first notice of deficiency (NOD) letter, dated March 30, 1999. On June 2, 1999, IDEM, OAQ received a response to a second NOD letter, dated May 10, 1999. On September 7, 1999 an agreement was signed by Monroe Custom Utility Bodies, Inc. in regards to IDEM, OAQ not reviewing the application until all the information was provided as requested in a third NOD letter. On August 23, 2001, A Notice of Violation was issued for Monroe Custom Utility Bodies, Inc. for constructing and operating without a permit, for not demonstrating compliance with the requirements of 326 IAC 8-2-2, and for not demonstrating compliance with the requirements of 326 IAC 8-2-9. On December 26, 2001, IDEM, OAQ received a response to a fourth NOD letter, dated November 6, 2001, which was written to reference a meeting between IDEM, OAQ and Monroe Custom Utility Bodies, Inc. on October 17, 2001. In the response to the fourth NOD letter, Monroe Custom Utility Bodies, Inc. requested a Federally Enforceable State Operating Permit (FESOP) instead of a Part 70 permit. On March 27, 2003, IDEM, OAQ received a response to a fifth NOD letter dated February 13, 2003.

On April 14, 2003, as a result of that response, Monroe Custom Utility Bodies, requested a Minor Source Operating Permit, in place of the previously requested FESOP permit. Based on the information provided by Monroe Custom Utility Bodies, Inc., IDEM, OAQ has determined that Monroe Custom Utility Bodies will operate with potential emissions commensurate with an MSOP.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

One (1) truck body manufacturing operation, consisting of the following:

(a) One (1) metal parts surface coating process, identified as EU1, capacity: 1,100 pounds of metal parts per hour, consisting of:

(1) One (1) undercoating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to a roof fan,

(2) One (1) primer coating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack S2, and

(3) One (1) color coating booth, installed in 1989, equipped with high volume low dry filters to control particulate overspray, exhausting to Stack S3.

(b) One (1) caulks and body repairs operations, identified as EU4, installed in 1969, delivers flow coating to the applicators, capacity: 12,000 pounds of metal parts per hour.

(c) One (1) touch-up operation, equipped with manual spray applicators.

(d) One (1) wash bay, identified as EU3, installed in 1969, capacity: 300 gallons of inorganic cleaning solvent per hour.

(e) One (1) gun cleaning operation, identified as EU5, installed in 1969, capacity 0.125 gallons of cleaner per hour.

(f) One (1) natural gas-fired boiler, identified as B-1, installed in 1989, exhausting to Stack B-1, heat input capacity: 1.50 million British thermal units per hour.

(g) Two (2) air make-up units, installed in 1989, capacity: 1.00 million British thermal units per hour each.

(h) One (1) welding and metal cutting operation, identified as EU2, installed in 1969, exhausting to Stack S1, consisting of the following:

(1) Nineteen (19) metal inert gas (MIG) welding stations, using Carbon Steel type of wire, capacity: 0.5 pounds of wire per hour each,

(2) Three (3) stick welding stations, capacity: 0.5 pounds per hour of welding rod each,

(3) Two (2) portable plasma cutters, each cut at 30 inches per minute on 0.125 inch hot rolled steel,

(4) One (1) plasma table, cuts at 30 inches per minute on 0.125 inch hot rolled steel, and

(5) Nine (9) oxyfuel stations, each cut at 30 inches per minute on 0.125 inch thickness.

(i) Unpaved roads.

Existing Approvals

The source has no previous approvals.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S1	Welding	14.0	2.0	7,450	Ambient
Roof Fan	Undercoating Booth	15.0	1.33	Unknown	Unknown
S2	Primer Coating Booths	28.0	4.0	20,700	Ambient
S3	Color Coating Booth	28.0	4.0	20,700	Ambient
B1	Boiler	21.0	0.83	Unknown	Unknown

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is aware that the one (1) undercoating booth, one (1) prime coat booth, and (1) color coat booth may not have been in compliance at one (1) previous time with the following emission limitation:

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal truck body shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried and extreme performance coatings.

(c) IDEM is reviewing this matter and has taken appropriate action.

(1) This proposed permit is intended to satisfy the requirements of the construction permit rules; and

(2) The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 11, 1996, with additional information received on April 26, 1999, June 2, 1999, December 26, 2001, March 12, 2002, March 27, 2003, as well as April 21 and 23, 2003.

A notice of completeness letter was mailed to the source on January 13, 1997.

Emission Calculations

See Pages 1 through 7 of 7 in Appendix A of this document for detailed emissions calculations.

Plasma Flame Cutting

Assuming that each cut for the two (2) portable plasma cutters and one (1) plasma table is 1/8-inch wide, with the stated metal thickness of 0.125 inch and a cutting rate of 30 inches per minute results in 28.125 cubic inches per hour cut. Using the density of iron, 0.72255 pounds per cubic inch, 28.125 cubic inches per hour = 20.322 pounds per hour. Assuming 1% of the metal cut is converted to fumes, the particulate emission rate for the two (2) portable plasma cutters and one (1) plasma table are each 0.203 pounds per hour, or 0.890 tons per year, each before controls for a total of 1.78 tons of particulate per year.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	**Potential To Emit** (tons/year)
PM	68.7
PM_{10}	55.7
SO_2	0.084
VOC	74.8
CO	1.29
NO_X	1.53

HAPs	**Potential To Emit** (tons/year)
Xylene	0.644
Toluene	0.921
MIBK	6.44
Methanol	0.443

HAPs	Potential To Emit (tons/year)
Styrene	0.152
Benzene	0.00003
Dichlorobenzene	0.00002
Formaldehyde	0.0001
Hexane	0.028
Lead	0.0001
Cadmium	0.00001
Chromium	0.072
Manganese	0.001
Nickel	0.003
TOTAL	8.71

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM_{10} are equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data and information supplied by the source on March 27, 2003.

Pollutant	Actual Emissions (tons/year)
PM	-
PM_{10}	1.00
SO_2	-
VOC	14.0
CO	-
NO_X	-
Xylene	2.71
Total HAPs	4.30

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Undercoating Booth	0.755	0.755	-	38.1	-	-	-
Primer Coating Booth	1.24	1.24	-	18.9	-	-	Single 3.37 Total 6.84
Color Coating Booth	0.343	0.343	-	14.1	-	-	-
Cleaning/ Purge Solvents	-	-	-	2.20	-	-	Single 0.664 Total 1.33
Touch-up	0.527	0.527	-	0.550	-	-	Single 0.211 Total 0.303
Caulks	-	-	-	0.744			Single 0.152 Total 0.152
Natural Gas-Fired Boiler and Air Make-up Units	0.029	0.117	0.009	0.084	1.28	1.53	Single 0.028 Total 0.029
Welding, Torch Cutting, and Plasma Cutting	4.46	4.46	-	-	-	-	Single 0.072 Total 0.076
Unpaved Roads	17.1	4.44	-	-	-	-	-
Total Emissions	25.0	11.9	0.009	74.8	1.29	1.53	Single Less than 10 Total Less than 25

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone

standards. Hancock County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Hancock County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, and 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source based on the emissions summarized in this permit, MSOP 059-7455-00026, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) any combination of HAPs is less than twenty-five (25) tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) The one (1) natural gas-fired boiler rated at 1.50 million British thermal units per hour, installed in 1989, is not subject to New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart Db or Dc, because the heat input capacity of the one (1) boiler is less than 2.9 megawatts (10 million British thermal units per hour).

(b) This source is not subject New Source Performance Standards (NSPS), 40 CFR 60, Subpart MM, because this subpart does not apply to truck body manufacturing plants for pre-assembled trucks.

(c) The cleaning and purging operations at this source are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because the this source does not use halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This truck body manufacturing source is not 1 of the 28 major PSD source categories pursuant to 326 IAC 2-2. The one (1) welding and metal cutting operation, one (1) gun cleaning operation, the one (1) wash bay, and the one (1) caulks and body repair operation were constructed prior to 1969, which is prior to the August 7, 1977 applicability date of this rule. The potential-to-emit each of the criteria pollutants from the entire source, including the under coating booth, the primer coating booth, and

the one (1) color coating booth, the one (1) natural gas-fired boiler, the two (2) natural gas-fired air make-up units, installed in 1989, is less than 250 tons per year. Therefore, this source is considered a minor PSD source.

326 IAC 2-4.1-1 (New Source Toxics Control)

All facilities at this source were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Hancock County and the potential to emit PM_{10}, NO_X, SO_2, VOC and CO is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

The potential fugitive particulate matter emissions from the entire source is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 6-5 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

There are no VOC emitting facilities at this source that were constructed after October 7, 1974 and prior to January 1, 1980, the potential to emit VOC from the entire source is less than one hundred (100) tons per year, and this source is subject the requirements of 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-6 are not applicable.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) natural gas-fired boiler, installed in 1989, is a source of indirect heating and must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the one (1) natural gas-fired boiler, installed in 1989, is 1.50 million British thermal units per hour.

$$Pt = 1.09/(1.50)^{0.26} = 0.980 \text{ lb/MMBtu heat input}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 million British thermal units per hour, Pt shall not exceed 0.6 pounds of particulate per million British thermal units.

Based on AP-42 emission factors, the particulate emissions from the one (1) natural gas-fired boiler is as follows:

1.9 lb PM/mmcf x 1 mmcf/1,000 MMBtu = 0.0019 lb PM/MMBtu

Therefore, the one (1) natural gas-fired boiler, constructed after 1989, will comply with this rule.

326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) undercoating booth, the one (1) prime coating booth, and the one (1) color coating booth, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(d) Pursuant to 326 IAC 6-3-1(b)(12), the one (1) touch-up operation is not subject to the requirements of 326 IAC 6-3 because the facility uses applications of aerosol coatings products to repair minor surface damage and imperfections.

(e) Pursuant to 326 IAC 6-3-1(b)(7), the one (1) caulks and body repair operations are not subject the requirements of 326 IAC 6-3 because the type of surface coating applicators used in the one (1) caulks and body repair operations are flow (bead) coating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-1(9), the nineteen (19) MIG welding stations and the three (3) stick welding stations are not subject to the requirements of 326 IAC 6-3 because less than a total of 625 pounds of rod or wire is consumed per day.

(b) Pursuant to 326 IAC 6-3-1(b)(10), the one (1) oxyfuel flame cutting station is not subject to the requirements of 326 IAC 6-3-2 because those stations cut less than 3,400 inches per hour of stock less than one (1) inch thick.

(c) Pursuant to 326 IAC 6-3-1(b)(14), the two (2) portable plasma cutters and the one (1) plasma cutting table are not subject to the requirements of 326 IAC 6-3-2 because potential particulate emissions from the plasma cutter are less than 0.551 pounds per hour each.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

This source is not considered an automobile and light duty truck assembly plant because it operates under the Standard Industrial Classification Code 3713 for the manufacturing of truck bodies for preassembled trucks. Therefore, the requirements of 326 IAC 8-2-2 are not applicable to this source.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) This source coats metal truck body parts under the SIC Code of major group 37. The one (1) metal parts surface coating process, which consists of the one (1) undercoating booth, the one (1) primer coating booth, and the one (1) color coating booth, each constructed in 1989, has a potential to emit greater than a total of (25) tons of VOC per year. Therefore, pursuant to the 326 IAC 8-2-9, the one (1) metal parts surface coating process is subject to following requirements:

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators in the one (1) metal parts surface coating process shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried and extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the one (1) metal parts surface coating process is in compliance with this requirement.

(b) The one (1) touch-up operation is not subject to the requirements of 326 IAC 8-2-9 because the facility is not part of the truck body manufacturing line and has a potential to emit of less than fifteen (15) pounds of VOC per day.

(c) The one (1) caulks and body repair operations is not subject to the requirements of 326 IAC 8-2-9 because this source is located in Hancock County and the facility was constructed before November 1, 1980.

Conclusion

The operation of this truck body manufacturing plant for pre-assembled trucks shall be subject to the conditions of the attached proposed Minor Source Operating Permit 059-7455-00026.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-7455
Plt ID: 059-00026
Reviewer: Michael S. Schaffer
Date: December 11, 1996

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Undercoating																
Gel Seal Undercoating	7.50	38.70%	0.0%	38.7%	0.0%	61.30%	1.00	3.00	2.90	2.90	8.71	208.98	38.1	15.1	4.73	75%
Prime Coat																
Vinyl Etch Primer (As Applied Mixed)	6.96	30.90%	0.0%	30.9%	0.0%	69.10%	0.240	4.00	2.15	2.15	2.06	49.55	9.04	5.06	3.11	75%
E2A-823 Primer (As Applied Mixed)	13.43	11.20%	0.0%	11.2%	0.0%	88.80%	1.00	1.50	1.50	1.50	2.26	54.15	9.88	19.6	1.69	75%
Color Coat																
GC-55017 Paint (As Applied Mixed)	8.42	34.00%	0.0%	34.0%	0.0%	58.10%	0.750	1.50	2.86	2.86	3.22	77.30	14.1	6.85	4.93	75%
Clean-up/Purge Solvent																
Superior #10 Thinner	8.42	100.00%	0.5%	99.5%	0.5%	0.00%	0.060	1.00	8.42	8.38	0.50	12.06	2.20	0.00	N/A	100%
Touch-up																
Self Etching	6.68	47.00%	0.0%	47.0%	0.0%	53.00%	0.020	2.00	3.14	3.14	0.13	3.01	0.550	0.527	5.92	15%
Caulking																
Lightweight Body Filler	9.95	3.80%	0.0%	3.8%	0.0%	96.20%	0.020	1.50	0.38	0.38	0.01	0.27	0.050	0.00	0.39	100%
Polyester Glazing Putty	15.00	5.20%	0.0%	5.2%	0.0%	94.80%	0.020	1.50	0.78	0.78	0.02	0.56	0.102	0.00	0.82	100%
3M Autobody Sealant	12.51	12.00%	0.0%	12.0%	0.0%	88.00%	0.060	1.50	1.50	1.50	0.14	3.24	0.592	0.00	1.71	100%
All coatings are "as applied" worst case mixtures or coatings as delivered to the applicators								PM	Control Efficiency	95.00%						
Note that the touch-up operation is uncontrolled.									**Uncontrolled**		**16.75**	**402.04**	**74.67**	**47.12**		
									Controlled		**16.75**	**402.04**	**74.67**	**2.86**		

Potential to Emit **Add worst case coating to all solvents**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-7455
Plt ID: 059-00026
Reviewer: Michael S. Schaffer
Date: December 11, 1996

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Methanol	Weight % Styrene	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Methanol Emissions (tons/yr)	Styrene Emissions (tons/yr)
Prime Coat													
Vinyl Etch Primer (As Applied Mixed)	6.96	0.240	4.00	2.00%	0.80%	11.50%	0.00%	0.00%	0.585	0.234	3.37	0.00	0.00
E2A-823 Primer (As Applied Mixed)	13.43	1.00	1.50	0.00%	0.00%	3.00%	0.00%	0.00%	0.00	0.00	2.65	0.00	0.00
Clean-up/Purge Solvent													
Superior #10 Thinner	8.42	0.060	1.00	0.00%	30.00%	10.00%	20.00%	0.00%	0.00	0.664	0.221	0.443	0.00
Touch-up													
Self Etching	6.68	0.020	2.00	5.00%	2.00%	18.00%	0.00%	0.00%	0.059	0.023	0.211	0.00	0.00
Caulking													
Lightweight Body Filler	9.95	0.020	1.50	0.00%	0.00%	0.00%	0.00%	3.80%	0.00	0.00	0.00	0.00	0.050
Polyester Glazing Putty	15.00	0.020	1.50	0.00%	0.00%	0.00%	0.00%	5.20%	0.00	0.00	0.00	0.00	0.102
All coatings are "as applied" worst case mixtures or coatings as delivered to the applicators									**0.644**	**0.921**	**6.44**	**0.443**	**0.152**
Note that the weight % of styrene is as emitted												**Overall Total**	**8.60**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-7455
Plt ID: 059-00026
Reviewer: Michael S. Schaffer
Date: December 11, 1996

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.50	30.66

Source-wide natural gas-fired combustion
One (1) boiler @ 1.50 MMBtu/hr
Two (2) air makeup units @ 1.00 MMBtu/hr, each

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.029	0.117	0.0092	1.533	0.084	1.288

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-7455
Plt ID: 059-00026
Reviewer: Michael S. Schaffer
Date: December 11, 1996

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.0021	0.0012	0.0750	1.8000	0.0034
Potential Emission in tons/yr	0.00003	0.00002	0.0011	0.0276	0.0001

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.00038	0.0021	HAPs
Potential Emission in tons/yr	0.00001	0.00002	0.00002	0.00001	0.00003	0.029

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Source-wide natural gas-fired combustion
Two (2) testing stations @ 1.00 MMBtu/hr, total
One (1) air makeup units @ 2.50 MMBtu/hr

Appendix A: Welding and Thermal Cutting

Company Name: **Monroe Custom Utility Bodies, Inc.**
Address City IN Zip: **3312 N. 600 W., Greenfield, Indiana 46140**
MSOP: **059-7455**
Plt ID: **059-00026**
Reviewer: **Michael S. Schaffer**
Date: **December 11, 1996**

PROCESS	Number of Stations	Max. electrode consumption per station		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING		(lbs/hr)		PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	19	0.5		0.0055				0.052	0.000	0.000	0.000	0.000
Stick (E7014 electrode)	3	0.5		0.0184	0.0103	0.00002	0.00006	0.028	0.015	0.000	0.00009	0.016
	Number of Stations	Max. Metal Thickness Cut	Max. Metal Cutting Rate	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
FLAME CUTTING		(in.)	(in./minute)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyfuel	9	0.125	30	0.1622	0.0005	0.0001	0.0003	0.328	0.001	0.0002	0.001	0.002
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.408	0.016	0.0002	0.0007	0.017
Potential Emissions lbs/day								9.80	0.395	0.006	0.017	0.417
Potential Emissions tons/year								**1.79**	0.072	0.001	0.003	0.076

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emission Calculations

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-7455
Plt ID: 059-00026
Reviewer: Michael S. Schaffer
Date: December 11, 1996

* * unpaved roads * *

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

Cars and Personal Trucks

8.0	trips/hr x					
0.114	miles/roundtrip x					
8760	hrs/yr =		**7989.1** miles per year			

For PM		**For PM-10**	
	Ef =		{k*[(s/12)^0.8]*[(W/3)^b]/[(Mdry/0.2)^c]}*[(365-p)/365]
4.27	=	1.11	lb/mile
10	where k =	2.6	(particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
7	s =	7	mean % silt content of unpaved roads
0.5	b =	0.4	Constant for PM-10 (b = 0.5 for PM-30 or TSP)
0.4	c =	0.3	Constant for PM-10 (c = 0.4 for PM-30 or TSP)
3	W =	3	tons average vehicle weight
0.2	Mdry =	0.2	surface material moisture content, % (default is 0.2 for dry conditions)
125	p =	125	number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)

	4.27	lb/mi x	7989.12	mi/yr =	PM	**17.07**	tons/yr
		2000	lb/ton				
	1.11	lb/mi x	7989.12	mi/yr =	PM-10	**4.44**	tons/yr
		2000	lb/ton				

Appendix A: Emission Calculations
Summary

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-7455
Plt ID: 059-00026
Reviewer: Michael S. Schaffer
Date: December 11, 1996

Emissions	Surface Coating and Cleaning	Combustion	Welding and Oxyfuel Cutting	Plasma Cutting	Unpaved Roads	**Total**
PM	47.1	0.029	1.79	2.67	17.1	**68.7**
PM10	47.1	0.117	1.79	2.67	4.04	**55.7**
VOC	74.7	0.084	0.00	0.00	0.00	**74.8**
SO2	0.00	0.009	0.00	0.00	0.00	**0.009**
NOx	0.00	1.53	0.00	0.00	0.00	**1.53**
CO	0.00	1.29	0.00	0.00	0.00	**1.29**
Xylene	0.644	0.00	0.00	0.00	0.00	**0.644**
Toluene	0.921	0.00	0.00	0.00	0.00	**0.921**
MIBK	6.44	0.00	0.00	0.00	0.00	**6.44**
Methanol	0.443	0.00	0.00	0.00	0.00	**0.443**
Styrene	0.152	0.00	0.00	0.00	0.00	**0.152**
Benzene	0.00	0.00	0.00	0.00	0.00	**0.00**
Dichlorobenzene	0.00	0.00	0.00	0.00	0.00	**0.00**
Formaldehyde	0.00	0.001	0.00	0.00	0.00	**0.001**
Hexane	0.00	0.028	0.00	0.00	0.00	**0.028**
Lead	0.00	0.00	0.00	0.00	0.00	**0.00**
Cadmium	0.00	0.00	0.00	0.00	0.00	**0.00**
Chromium	0.00	0.00	0.072	0.00	0.00	**0.072**
Manganese	0.00	0.00	0.001	0.00	0.00	**0.001**
Nickel	0.00	0.00	0.003	0.00	0.00	**0.003**
Total HAPs	8.60	0.029	0.076	0.00	0.00	**8.71**

Note that plasma cutting calculations can be found on Page 4 of 10 of the TSD